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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates To:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

**DECLARATION OF RANDALL S. LUSKEY IN
SUPPORT OF DEFENDANTS' STATEMENT IN
SUPPORT OF PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL SHOULD
BE FILED UNDER SEAL**

Judge: Hon. Lisa J. Cisneros
Courtroom: 6 – 15th Floor

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DECLARATION OF RANDALL S. LUSKEY

I, Randall S. Luskey, declare pursuant to 28 U.S.C. § 1746:

1. I am a partner at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, “Uber”). I am a member in good standing of the Bar of the State of California. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so. I respectfully submit this declaration in support of Uber’s Statement in Support of Plaintiffs’ Administrative Motion to Consider Whether Another Party’s Material Should Be Filed Under Seal.

2. I have reviewed Exhibit A [ECF 291-3] and Exhibit B [ECF 291-4] to the Declaration of Sarah R. London in Support of Administrative Motion to Consider Whether Another Party’s Material Should Be Filed Under Seal [ECF 291-1].

3. Exhibit A is a redacted version of an exemplar settlement agreement between Uber and an individual plaintiff.

4. Upon information and belief, the plaintiff that agreed to the settlement in Exhibit A was an independent driver instead of a rider on a trip requested via the Uber app.

5. Exhibit B is an exemplar of a settlement agreement between Uber and an individual plaintiff.

6. Exhibit A and B contain confidential information that would cause undue harm and violate the individual plaintiffs’ expectation of privacy if publicly disseminated.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 1, 2024, in San Francisco, California.

/s/ Randall S. Luskey
Randall S. Luskey